

STEPHEN D. HANS
& ASSOCIATES, P.C.
LABOR & EMPLOYMENT COUNSEL FOR OVER 40 YEARS

30-30 Northern Blvd, Suite 401
Long Island City, NY 11101

T: 718.275.6700 • F: 718.275.6704

MEMO ENDORSED


August 12, 2025

VIA ECF

Hon. Edgardo Ramos, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

The parties' request is granted. The parties are directed to submit their settlement agreement for Court review pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 200 (2d Cir. 2015) by September 10, 2025.

SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: August 13, 2025
New York, New York

Re: **Quizhpi et al v. Spa Management Service Inc. et al.**
Case No. 1:23-cv-00906-ER

Dear Judge Ramos:

Our office represents the Defendants in the above-referenced matter. The case was settled through the difficult but dedicated effort of counsel and the m=Mediator. This letter is written as a joint letter.

The Court's Order dated July 30, 2025, set tomorrow as the deadline for filing the Settlement Agreement pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). Unfortunately, my client recently lost her mother and had to travel overseas. She has since returned and is coping with profound grief.

This case was settled just days before the tragic event, along with a companion case in which Plaintiff's counsel was also very understanding. Both settlements require the Defendant to obtain a loan. The Defendant has filed an application with a financial institution. I have personally known the Defendant for fifteen years. She is extremely honest, religious and intends to honor both settlements.

However, she has a job which is also in jeopardy because of her family legal obligations and personal loss. Despite these challenges, the Defendant remains committed to fulfilling the settlement obligations. We anticipate that the loan approval will take approximately one month.

Again, the Defendant is not someone who would default or abandon her responsibilities. She simply required additional time.

Given the unfortunate events, I respectfully request that the Court grants an extension for one month to allow the Defendant time to complete the necessary steps to file the settlement papers.

We appreciate the Court's consideration of this request.

Respectfully Submitted,

/s/Stephen Hans

Stephen D. Hans, Esq. (SH-0798)

30-30 Northern Boulevard

Suite# 401

Long Island City, NY 11101

Tel: 718-275-6700